

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF M.F.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, M.F., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am the parent of Child A. I live in Seattle, Washington with my husband and
5 child.

6 3. I am a manager in the field of horticulture and my husband is an administrator at
7 a non-profit arts organization.

8 4. We adopted Child A at birth in an open adoption. Child A is transgender and uses
9 she/they pronouns. Child A's sex was designated male at birth, but since age five, her gender
10 identity has been female/nonbinary and her pronouns have been, and continue to be, she/they. In
11 this document I will use she/her pronouns for consistency and refer to her as "my kid" because
12 she does not like the word daughter. She is now nine years old and in the third grade.

13 5. In her early years, there were many signs that her gender might not match her sex
14 assigned at birth. Just before her third birthday, she started having a lot of very specific questions
15 about where babies come from – how did she get into her birth mom, how did she get out, why
16 wasn't I her birth mom, etc. We got a children's book about where babies come from called "It's
17 Not the Stork," and for about six months it was all she wanted us to read to her – over and over.
18 She is a very smart kid and at that point had such a firm grasp on the concepts that at about three
19 and a quarter she asked me, verbatim, "Why did you not get eggs from another woman so you
20 could have a baby?"

21 6. At the time, we assumed her hyperfocus on the book, and some others we also
22 got on the topic, was her coming to terms with, and trying to understand, her adoption. In
23 retrospect, we think she was also trying to understand the parts about how girls grow up to be
24 women and boys grow up to be men. None of the books included any mention of gender as
25 opposed to sex, or transgender people, and we didn't even think to talk about it.
26

1 7. Around that time, she told me that when she grew up, she wanted to be a woman.
2 Many, many times, she said when she grew up she wanted to be a mommy and have a baby, and
3 occasionally that she wished she had been born a girl. For a few months, she regularly pretended
4 to be pregnant and give birth to her favorite stuffed animals, complete with noise effects. I
5 explained that her having a baby was not possible and why, and that she would grow up to be a
6 man and could be a parent and a daddy.

7 8. Despite knowing transgender adults, including my niece who transitioned as a
8 young adult, it didn't really occur to us that she could be transgender – we just thought she didn't
9 yet understand that girls become women and boys become men, and that this "confusion" was a
10 normal part of the learning process.

11 9. A little after she turned three, she became fascinated with the one nightgown I
12 owned that I'd wear if it was really hot out (I rarely wear dresses or skirts), and asked if she
13 could have one. A friend gave us one of her daughter's nightgowns that she had grown out of,
14 and soon after we bought her a unicorn nightgown (she loved unicorns and horses at the time).
15 She loved them both and wore them regularly with pants. Occasionally she'd refuse to change
16 out of one, so she'd wear it to daycare.

17 10. At some point later that year, still at the age of three, she told me and my husband
18 that her pronouns were she/her, but that it was a secret. At the time, I think we just thought it
19 was cute and funny. We had not talked to her about pronouns, but we knew that the teachers at
20 her preschool told the kids their pronouns so she had some sense of what they were.

21 11. For Christmas, shortly after she turned four, we got her two Frozen nightgowns
22 with matching slippers that were instant hits. She occasionally wore the slippers under her socks,
23 inside her shoes, because she did not want to take them off. Sometime that year she told her
24 teachers at preschool that her pronouns were she/her, but again, that it was a secret. Her teachers
25 let me know when I picked her up and I told them she had also told us that the previous year. At
26 the time, we had read that transgender kids would say, for example, "I am a girl," rather than, "I

1 want to be a girl,” and since she didn’t match that stereotype, we thought it was likely just a
2 phase.

3 12. When she was four and a half, I cut her hair quite short without thinking about it.
4 Since she was little, we would let it grow out until it got unruly and then when I could make
5 time, I’d cut it short so I wouldn’t have to do it again for a while. Like most kids, she wasn’t
6 great at sitting still and getting her hair cut, so it was just an easy and functional approach.
7 Afterwards, when she saw how she looked in the mirror, she got very upset – it was pretty
8 traumatic for her. This was during the COVID shutdown, so we were having regular video calls
9 with each of her birth parents, rather than hanging out in person. On a call with her birth dad,
10 she insisted on wearing a hat so he wouldn’t see her hair. With her birth mom, she refused to use
11 the video, because she said she didn’t want her birth mom to see her like that.

12 13. From about ages two to five, almost all of the dress-up and Halloween costumes
13 that she picked out and wore, both at school and at home, were fairy and princess dresses. She
14 loved costume jewelry, crowns, tiaras, and long satin gloves. However, outside of dress-up,
15 getting her to change her clothes even once a day was a huge and constant struggle. She would
16 get very upset, refuse to change her clothes, and spent much of her time at home half dressed.
17 Somewhere around age two or three, we fully gave up on pajamas and would just let her wear
18 her daytime clothes to bed every night to avoid enormous bedtime battles. At some point we
19 decided that making her change her clothes daily was not worth the distress it was clearly causing
20 her (and us), so we came up with a three-day limit. Most days we could get her to change one or
21 two parts of her outfit; but if it had been three days since she had changed something, then we
22 would insist.

23 14. We generally didn’t need to worry about her clothes getting dirty, because up
24 until she socially transitioned at age five, she was a noticeably cautious, introverted kid who
25 tended to watch other kids play rather than join in. She did not like getting wet, touching anything
26 that was sticky or dirty, or getting anything on her hands. She had a lot of fears and anxieties

1 that affected her everyday life, particularly doing anything outside of her normal daily
2 home/daycare routine like going places, trying new things, or interacting with other people.

3 15. During these years, from about three to five, it was obvious to us, as well as to
4 friends, extended family, her preschool, and other parents, that she loved wearing dresses and
5 jewelry, was more interested in girls her age than boys, and just generally leaned towards a more
6 traditionally feminine style. Despite being primarily into gender neutral or traditionally “male”
7 toys (swords, weapons, Nerf guns, and all forms of battling), she also loved Wonder Woman,
8 from age two on insisted that all her stuffed animals were girls, and at times she had a long list
9 of imaginary sisters.

10 16. At the time, we felt like we were supporting her by telling her she could wear,
11 play with, and look however she wanted. I’d explain to her that a boy can wear a princess dress,
12 but still be a boy – a girl can have short hair and still be a girl. At the time, I remember thinking
13 and saying to my husband that I didn’t want her to think she could choose between being a boy
14 and a girl because in reality, her options were between being a boy and a transgender girl; I didn’t
15 believe she had the ability to understand what it meant to be transgender, or the consequences or
16 meanings it would have as she grew older.

17 17. Just before she turned five, after six months of being closed for COVID, her
18 preschool reopened. I picked her up at the end of the first day and she was absolutely glowing. I
19 asked how the day went, and she said in class that they asked what everyone’s pronouns were. I
20 asked what she said, and she replied, “she/her.” I said, “Do you want me and Daddy to use
21 she/her?” She very emphatically said, “No!” A few weeks later she had her annual health
22 checkup with her pediatrician, who she has seen since she was born. She insisted on wearing her
23 Frozen nightgown and matching slippers inside her shoes.

24 18. For the next four months, at home we used he/him and at school, while at
25 preschool they used she/her. We tried at times to talk to her about pronouns and gender, but she
26 would get very upset and say she did not want to. We were supportive of the change, but also

1 didn't know if we should be doing something different. I made an appointment to talk with her
2 pediatrician, who said that we should just let her set the pace and follow her lead – she'd talk to
3 us about it when she was ready.

4 19. Those four months were an incredibly stressful and traumatic time for her. She
5 began having daily outbursts and upsets, screaming and attacking us, to an extreme that she had
6 never done before, even at two or three. One day when we talked a little about the different
7 gender identities people have, she said, "I hate gender, I hate nonbinary." She didn't like any of
8 the options.

9 20. About three months after she changed pronouns at school, we had a playdate with
10 her good friend whom she hadn't seen since the COVID shutdown. Her friend's older sister is
11 two years older and is also a transgender girl. On our way home, I asked if she remembered that
12 her friend's sister is a girl but has a penis. She said she had forgotten that. The very next day she
13 asked if she could have some dresses. She did not want to pick them out, so I went and picked
14 some up at Target. Very quickly she changed to wearing dresses over her pants most days.

15 21. A month later, in January 2021, about four and a half months after changing
16 pronouns at school, one evening she said to me and my husband "I don't want to be he/him
17 anymore." We asked what pronouns she'd like us to use, and she said, "What are the choices?"
18 We said most people use she/her, he/him, or they/them. She said she didn't know, either she/her
19 or they/them, she just didn't want to be he/him. So, we said, "How about we use she/her, since
20 that's what you have been saying for a long time now." We told her that we would love her
21 forever and always, no matter what, and that we'd call her whatever she wanted. She also let us
22 know that she didn't like boy, son, girl, daughter, brother, or sister and just wanted us to use kid.

23 22. The next day, she said she didn't want to wear boy clothes anymore. We
24 contacted our friends, and one friend dropped off a big box of clothes at our house that her
25 daughter had grown out of. When we opened the box, it was like Christmas morning. For the
26 next hour or two, our child, who we had to fight to get to change her clothes, tried on just about

1 every item. She danced around, putting on dress after dress, trying on fancy shoes, skirts, and
2 blouses. She liked all of it. Overnight, getting her to change her clothes, a problem we had
3 struggled to get her to do, day in and day out, pretty much disappeared (we still skipped pajamas).

4 23. Within the next two to three weeks, she blossomed. All the doubts we had about
5 whether she should change pronouns and whether a kid her age could know their own gender
6 simply went away when we saw the extent of her transformation. The outbursts, anger, and
7 meltdowns were gone. She was light and happy for the first time in a long time, and her crippling
8 anxiety and constant fears lessened dramatically.

9 24. She started singing and dancing around the house and was suddenly comfortable
10 being and playing by herself, which was a huge change. Prior to changing pronouns and clothes,
11 she had to be right by me or my husband at all times and was afraid of being in a room by herself
12 for even a few minutes. She also demanded to be played with constantly, which as all parents
13 know, is not possible. Now she would start playing in a room all by herself and would happily
14 yell, "Don't come in, I'm busy playing!" It was like suddenly parenting a whole new kid. It was
15 still all her, but she was comfortable, confident, and relaxed. At preschool she started playing
16 and interacting with other kids and was noticeably less anxious and fearful about going places
17 and doing new things.

18 25. During those first couple weeks, my husband and I were embarking on a crash
19 course on gender creative and transgender kids. We quickly realized we had questions and
20 concerns, as well as lots of stereotypes and misunderstandings. We read what leading medical
21 organizations had to say, reviewed studies and research on the topic, and sought out books on
22 the topic written by medical and psychiatric professionals.

23 26. I was accepting of it, but not fully and wholeheartedly on board until I binged the
24 "How to Be a Girl" podcast. The podcast enabled me to understand and embrace my child fully,
25 while giving me the tools to talk to my kid about gender.
26

27. Here are a few of the conversations I had with her in the two weeks after she transitioned, as I documented them at the time:

Me: "Have you been trying to tell me and daddy for a long time now that you're a girl?" Her: (nodding)

Me: "And were we not really listening?"

Her: (strong nodding)

Me: "I'm really sorry we weren't listening, and we are listening now. Can you forgive me?"

Her: "Yes!!" (then I got a huge happy hug)

A few days later...

Me: "Do you know what the word transgender means?"

Her: "No."

Me: "A transgender girl is a girl who was born with a penis. A transgender boy is a boy who was born with a vagina." (My goal was to explain it as simply as possible.)

Her: "So I'm a transgender girl?"

Me: "I don't know. That's for you to decide."

Her: "I am."

Then she gave me a quarter that she had been carrying around and said, *"This is for you. I'm going to give you all my money." "Why?" "For saying that."*

A few days after that, out of the blue, she gave me a penny she found on the table and said, *"Thank you for saying that thing about transgender."* Then we talked some more about it, and she again said she was a transgender girl. I think giving her words to make sense of it to herself helped her understand it better, which of course makes perfect sense. She says she felt like both a boy and a girl, but more of a girl. We have no idea where she'll end up on the spectrum as she gets older, but her having more words that fit how she was feeling was clearly helpful to her.

Since the above conversation, she's referred to herself as transgender a number of times. We've also talked about being non-binary, meaning someone who feels they are both a boy and girl, or neither a boy and girl, but currently she seems to be identifying more with the term transgender. She has said a few times she feels like a girl most of the time and sometimes feels like nothing. But she said she couldn't explain it. She also said she thinks about her gender every day, all the time, for a long time now, which makes me sad. She's so young to be thinking about such a big topic all the time. But from our reading it seems that is very common for kids this age who don't identify with their sex assigned at birth. About a week ago she (drew us a picture of herself in a dress) and wrote, *"How I wish I was (her name) the girl."* She and I talked about it for a bit, and she explained that she thinks she is non-binary and maybe transgender but she is definitely not cisgendered (someone whose sex matches their gender - we introduced that word after transgender and non-binary). But she said she wishes

1 she could be a transgender girl and feel like a girl all the time, and that it's hard
2 to sometimes feel like a girl and sometimes not.

3 28. That fall, she started kindergarten, at a school where only a small handful of kids
4 knew her prior to transitioning. Even though she easily passed as a cisgender girl, it was
5 important to her to let her classmates, teacher, new friends, and their parents know that she was
6 transgender. Per her request, we explained it to the adults, answered their questions, and asked
7 them to help explain it to their kids. Her school and teacher were very supportive, and her teacher
8 helped her explain it to her class by reading two of her favorite kid's books about being
9 transgender. In reality, none of her peers have ever cared. To them, she's just another kid. Since
10 she learned the word transgender, she has continued to very much identify as a transgender girl,
11 rather than just a girl. It's been important to her to make that distinction, because it is a closer
12 approximation than "girl" to how she feels about herself.

13 29. She's now a 3rd grader and it's been just over four years since she transitioned.
14 She's still a bookworm but is also outgoing and confident. She's into sports and has started to
15 find things she really connects with – from live action role play and Dungeons & Dragons to
16 Taylor Swift and Chappell Roan. She has developed her own sense of style – lots of leggings,
17 black, and velour – and seems to be really coming into her own. She feels good about being
18 transgender and we're regularly seeing hints of tweendom.

19 30. None of this is to say that her life is now perfect and she no longer has struggles
20 or stresses since transitioning, but rather that living as a boy was extremely stressful and anxiety
21 producing, as it didn't and still doesn't match how she feels about herself. Since transitioning,
22 that source of anxiety and upset is no longer debilitating. It's not in her way every day, adding a
23 huge weight that she couldn't get out from.

24 31. Personally, I have been on an anti-depressant for depression and severe anxiety
25 for over two decades now, since my late twenties, and can honestly say it saved my life. The
26 medication didn't make my problems go away, but it quieted down my anxiety to a level that I

1 could manage. That largely took care of the depression, so I could just be myself and live my
2 life without being constantly consumed by anxiety and upset. When my kid transitioned, it felt
3 like she was having a similar experience. It enabled her to quiet down her dysphoria to a level
4 she could manage so she could just be in the world.

5 32. Shortly after she transitioned, she asked me about how her body would change
6 when she reached puberty. I told her that when she is a teenager, daddy and I would work with
7 her and her doctors to help make her body look more like how she wanted it to. We didn't get
8 into all the details, but it was more than obvious that she was elated and relieved.

9 33. Since she transitioned, she's brought it up again from time to time and we've
10 talked about it and answered her questions. Over the past year, she's starting to notice changes
11 in her body so it's a topic she's been thinking and talking to us about more and more. Three
12 different doctors have been monitoring her growth every few months and have said it will likely
13 be time for a blocker in the next three to six months or so.

14 34. If the recent executive order restricting gender-affirming care for transgender
15 youth goes into place, it will prevent her, and other trans kids like her, from going on a blocker.
16 Several years from now, it would remove the option of cross-gender hormones, a decision that
17 would be made slowly and thoughtfully, by her, my husband and me, and her doctors.

18 35. What's critical to understand is that if a preteen goes on a blocker in the beginning
19 stages of puberty and then, at some point, decides with their parents and doctors to go on
20 hormone therapy, with the exception of their genitals, they will be visually indistinguishable
21 from their same gender peers. This means that to others, as a teenager and adult, for the duration
22 that she was on hormones, she would look from the outside as if she was assigned female at
23 birth. Blockers and hormone treatment, started during the teenage years, give a transgender
24 person the opportunity, with the exception of their genitals, to look like the gender they feel for
25 the rest of their lives.
26

1 36. It's also important to understand that hormones do not work quickly. As most
2 adults can remember, puberty is a long process that takes many years. Medical transition for
3 trans kids and adults is equally slow. The difference is that it is deliberate and thought out,
4 involving family, reading, many discussions, and input from a long list of various medical
5 professionals. If at any time during the long process that is puberty she changed her mind, she
6 could stop taking hormones. After puberty, if she wanted the physical changes to persist, she
7 would need to remain on hormones for the rest of her life. If at any point - at age 15, 20, 30, 50,
8 or even 70 – she was to stop taking them, she would begin going into male puberty.

9 37. Permanent changes happen when someone goes through their sex at time of birth
10 puberty – changes that can't be undone. As a trans girl, my child's voice would drop; she'd
11 develop an Adam's apple; facial hair would develop; she would likely grow significantly taller;
12 and her bone structure in her face, shoulders, and hips, would irreversibly change, making her
13 look for the rest of her life, like a man. Blockers and hormones are not permanent, but the
14 majority of the changes that happen while going through one's sex at birth puberty are
15 permanent.

16 38. This change is tolerable for some transgender people, but many others have
17 debilitating dysphoria when what they see in the mirror, and what others see, does not match
18 how they feel. Not all transgender people have surgeries, but the majority who do (or who want
19 to, but don't have access or can't afford it), are having those surgeries to reverse changes that
20 resulted from their sex at birth puberty. These are surgeries they wouldn't have needed had they
21 had access to gender-affirming care during puberty.

22 39. Without surgery, most adult transgender people will struggle to pass, or blend, as
23 their gender. This can be emotionally harmful, and in the vast majority of this country can be
24 physically dangerous. Whether you can pass as your gender in this world affects whether you
25 can get and keep a job, rent or buy a home, get on a bus or a plane, travel, and just be in the
26 world.

1 40. Here is something as I documented it at the time, a little while after she
2 transitioned:

3 One day after school she quietly asked if she could tell me a secret and made me
4 promise to tell no one. Then she said, "*I hate myself.*" She was crying, and I
5 teared up and looked really sad, because it was heartbreaking. When she saw that
she got very upset she started crying and saying, "*Forget what I told you!! You
have to forget it!!*" I think she didn't want to make me sad.

6 We talked about it for a while and several times she said that she wished she was a girl. I said
7 that if she feels like a girl then she is a girl, and asked if there was anything that she could think
8 of that would help make her feel like a girl. She said she wanted to look like a girl. I said with
9 her clothes and long hair she does look like a girl. She said she wanted her body to look like a
10 girl.

11 41. It is now four years later and this feeling has not gone away. It has been consistent
12 and persistent. Currently, she very much wants to go on hormones. She's excited about puberty
13 and middle school, and if she had her way, would start all of it immediately. I believe she knows
14 herself better than anyone else does, and with information and support from us and her many
15 doctors, she will be able to understand the consequences and trade-offs and make a decision that
16 feels right to her.

17 42. I want her to have the option to go on a blocker and later, to decide if she wants
18 to go on female hormones. If she wants them, cross-gender hormones will give the best chance
19 of being able to look the way she wants and be safe walking out her door. Yes, like all medical
20 choices, it would involve risks and would very likely affect her future ability to have children.
21 As a woman who is infertile and chose to adopt rather than pursue fertility treatments, I take that
22 risk very seriously. But her not having this option, in my opinion, poses even greater risks. All
23 the data suggests that those risks include dysphoria, anxiety, depression, self-harm, addiction,
24 sexual abuse, and both emotional and physical violence from those around her.

25 43. I fear for our child's mental health and safety if this Executive Order isn't
26 stopped. I fear that her anxiety will be exacerbated, and that she will struggle with anxiety and

1 compulsive disorder (OCD), and when her anxiety is high, they start to impact her ability to
2 function well in everyday life.

3 44. Why aren't we pursuing this fight ourselves? The answer is simple: not only do
4 we not have the time, money, or expertise, but it would be dangerous to do so. The
5 misinformation, stereotypes, and rhetoric about transgender people, and especially trans kids –
6 including from the President of the United States – is hateful and intense. It would be incredibly
7 unsafe for us to put our names or our child's name out in public. With the internet as it is today,
8 we would be putting our lives and our child's life at risk, not just now but for the rest of her life.
9 This is why we need the Attorney General to take on this Executive Order in court. It is an issue
10 of safety, and it affects transgender youth all over this state and country.

11 45. I am using my initials instead of my full name in this declaration to protect my,
12 my husband's, and my child's identity, to protect my minor child's privacy, and to protect us
13 from retaliation, harassment, and violence.

14
15 I declare under penalty of perjury under the laws of the State of Washington and the
16 United States of America that the foregoing is true and correct.

17 DATED and SIGNED this 4th day of February 2025, at Seattle, Washington.

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19 _____
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